



defendants herein, did knowingly and intentionally combine, conspire, confederate and agree together and with each other, and with other persons known and unknown to the Grand Jury, to possess with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A)(ii).

**COUNT TWO**

**Aiding and Abetting Possession with Intent to Distribute a Controlled Substance**

On or about April 23, 2012, in the Southern District of Texas,

**KEVIN BENNARD BIGGURS,  
ISAAC HERRON,  
JEAN CARLO LUCIO,  
aka Strawberry,  
VICTOR EDUARDO OLIVA,**

aiding, abetting, and assisting one another and others known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(ii) and Title 18, United States Code, Section 2.

**COUNT THREE**

**Aiding and Abetting Possession with Intent to Distribute a Controlled Substance**

On or about November 1, 2012, in the Southern District of Texas,

**JUAN MANUEL BANDA,  
EDDIE EDUARDO BEJAR,  
aka Fat Boy,  
aka Yogi,  
JEAN CARLO LUCIO,**

**aka Strawberry,  
DOUGLAS SAUL RAMIREZ,**

aiding, abetting, and assisting one another and others known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(ii) and Title 18, United States Code, Section 2.

**COUNT FOUR**

**Aiding and Abetting Possession with Intent to Distribute a Controlled Substance**

On or about December 12, 2012, in the Southern District of Texas,

**DOUGLAS SAUL RAMIREZ,**

aiding, abetting, and assisting others known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(ii) and Title 18, United States Code, Section 2.

**COUNTS FIVE and SIX**

**Structuring  
Domestic Financial Institutions**

On or about the dates set forth below, in the Southern District of Texas,

**LEROY GREER,**

the defendant, as named below in each Count Five through Six, did knowingly and for the purpose of evading the reporting requirements of section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, structure the following transactions with domestic financial institutions:

**COUNT 5**

<u><b>Date</b></u>	<u><b>Deposit/Withdrawal</b></u>	<u><b>Account Holder</b></u>	<u><b>Account number</b></u>
3/5/2012	\$3,000.00	Negotiate One, Inc.	XXXXXXX9237
3/5/2012	\$2,340.00	Negotiate One, Inc.	XXXXXXX9237
3/5/2012	\$3,000.00	Negotiate One, Inc.	XXXXXXX9237
3/5/2012	\$2,100.00	Negotiate One, Inc.	XXXXXXX9237
3/5/2012	\$60.00	Negotiate One, Inc.	XXXXXXX9237

**COUNT 6**

<u><b>Date</b></u>	<u><b>Deposit/Withdrawal</b></u>	<u><b>Account Holder</b></u>	<u><b>Account number</b></u>
3/26/2012	\$6,900.00	Negotiate One, Inc.	XXXXXXX9237
3/26/2012	\$3,000.00	Negotiate One, Inc.	XXXXXXX9237
3/26/2012	\$600.00	Negotiate One, Inc.	XXXXXXX9237
3/26/2012	\$100.00	Negotiate One, Inc.	XXXXXXX9237

All in violation of Title 31, United States Code, Sections 5313, 5324(a)(3) and 5324(d);

**NOTICE OF CRIMINAL FORFEITURE**  
**(21 U.S.C. § 853)**

Pursuant to Title 21, United States Code, Section 853, as a result of the commission of a violation of Title 21, United States Code, Section 846 or 841, notice is given to defendants,

**JUAN MANUEL BANDA,  
EDDIE EDUARDO BEJAR,  
aka Fat Boy  
aka Yogi,  
KEVIN BENNARD BIGGURS,  
LEROY GREER,  
ISAAC HERRON,  
JEAN CARLO LUCIO,  
aka Strawberry,  
VICTOR EDUARDO OLIVA,  
DOUGLAS SAUL RAMIREZ,**

that in the event of conviction, the following property, whether real or personal, is subject to forfeiture to the United States:


1. all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such offenses; and
2. all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

Substitute Assets

Defendants are notified that in the event that property subject to forfeiture, as a result of any act or omission of a defendant,

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the court;
- (D) has been substantially diminished in value; or
- (E) has been commingled with other property that cannot be divided without difficulty,

the United States will seek to forfeit any other property of the defendants up to the total value of the property subject to forfeiture, pursuant to Title 21, United States Code, Section 853(p).

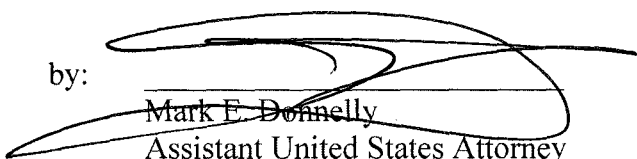
A TRUE BILL: 

Original Signature on File

FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON  
United States Attorney  
Southern District of Texas

by:

  
~~Mark E. Donnelly~~

Assistant United States Attorney